

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BEVERLY L. WRIGHT,

:

Plaintiff,

:

v.

:

**JOHN E. POTTER,
POSTMASTER GENERAL,
UNITED STATES POSTAL SERVICE,**

:

Civil No.: AMD-02-4181

:

Defendant.

:

...oOo...

CONSENT MOTION FOR EXTENSION OF TIME

Defendant, John E. Potter, Postmaster General of the United States Postal Service, by and through his attorneys, Thomas M. DiBiagio, United States Attorney for the District of Maryland, and John W. Sippel, Jr., Assistant United States Attorney for said District, files this Consent Motion for Extension of Time and for cause states:

1. This case arises out of Plaintiff's claims of employment discrimination while employed with the United States Postal Service. Plaintiff filed her Complaint on or about December 26, 2002.

2. The Defendant was served with a Summons and a copy of Plaintiff's Complaint on or about April 26, 2002. Defendant obtained Plaintiff's counsel's consent for a thirty-day extension to file a response to the Complaint, and the Court granted Defendant's Motion for Extension of Time on June 10, 2003. Per the Court's Order, Defendant's response to Plaintiff's Complaint is due on July 18, 2003.

3. Agency counsel was unable to get the file materials to undersigned counsel so that undersigned counsel could file the response by the due date. In addition, undersigned counsel was

required to travel to Seattle, Washington for a deposition from July 15 through July 17, and undersigned counsel's travel schedule did not allow for sufficient time to review the materials received from the agency and file the Defendant's response by July 18.

4. Due to these circumstances, Defendant requests a brief extension to file his response to Plaintiff's Complaint. Specifically, Defendant seeks an additional thirty (7) days in which to file his response.

5. Pursuant to Local Rule 105.9, Plaintiff's counsel consented to this extension of time.

WHEREFORE, Defendant, John E. Potter, Postmaster General of the United States Postal Service, prays for an Order extending the time through and including **July 25, 2003** to file his response to Plaintiff's Complaint.

Respectfully submitted,

Thomas M. DiBiagio
United States Attorney

By: _____/s/
John W. Sippel, Jr.
Assistant United States Attorney
Bar No. 25484
6625 United States Courthouse
101 West Lombard Street
Baltimore, Maryland 21201
Tel.: (410) 209-4807
Fax: (410) 962-2310

Attorney for Defendant,
John E. Potter, Postmaster General
of the United States Postal Service